

April 11, 2006

MEMORANDUM

PIM #06-02

TO: District Directors
Environmental Health Managers
Division of Food and Environmental Services Staff

FROM: Gary L. Hagy, Director
Division of Food and Environmental Services

SUBJECT: Re-use of Plastic Pickle Buckets

The attached PIM addresses the re-use of plastic pickle buckets in food establishments. This PIM is based on guidance received from the U.S. Food and Drug Administration on this issue.

Please insert this document in your PIM manual and distribute copies to all persons in your district working in your foodservice protection program. Please note that the effective date is April 17, 2006.

If you have any questions, please contact me.

Attachment

Program: Foodservice Protection

Subject: Plastic Pickle Buckets

Issue: Can plastic pickle buckets be reused?

Authority: Food Regulations §12 VAC 5-421-1750, Definitions, “Single-use articles”

Public Health Rationale: In the past, single-service and single-use articles may not be reused as they were not sturdy enough to withstand repeated use and were smooth and easily cleanable.

Background: The construction of single-service and single-use articles, (utensils and containers) prevent them from being easily cleanable and capable of withstanding repeated cleaning. Traditionally pickle buckets were constructed of wood or a non-smooth plastic. Today these buckets are constructed of a heavy grade, smooth plastic food grade material which is smooth and easily cleanable and can withstand repeated use and cleaning.

Interpretation: The reuse of heavy grade, smooth food grade plastic, five gallon buckets is acceptable provided that they are:

1. Cleaned and sanitized before use
2. Free of rolled rims and crevices
3. Smooth and easily cleanable
4. The original lids are not reused

This interpretation does not apply to small (one gallon or less) barbecue containers, dairy product container, or any other thin plastic food containers.

Responsibility: The local Environmental Health Specialist Senior is responsible for the application of this interpretation in specific foodservice establishments.

Effective Date: 17 April 2006

Approved by: _____

Director
Division of Food and Environmental Services